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*Co-Counsel to the Debtors and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re:	)	
	)	Chapter 11
	)	
TOYS "R" US, INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 17-34665 (KLP)
	)	
Debtors.	)	(Jointly Administered)
	)	

**AGENDA FOR HEARING ON MOTIONS SCHEDULED FOR DECEMBER 13, 2018**

**PLEASE TAKE NOTICE** that the following matters are scheduled for hearing on December 13, 2018 at 11:00 a.m. (prevailing Eastern Time):

**I. TOYS DELAWARE UNCONTESTED MATTERS [CASE NO. 17-34665]**

1. **"Motion to Expedite"** Motion to Expedite Hearing on Debtors' Motion for Entry of an Order (I) Approving the Settlement Agreement Between the Debtors, the Ad Hoc Group of Taj Noteholders, the Official Committee of Unsecured Creditors, and the Ad Hoc Group of B-4 Lenders and (II) Granting Related Relief [Docket No. 5923]

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 78]. The location of the Debtors' service address is One Geoffrey Way, Wayne, New Jersey 07470.

Responses Received: None

Related Documents: None

Status: This matter is going forward.

2. “Motion to Approve Compromise” Debtors' Motion for Entry of an Order (I) Approving the Settlement Agreement Between the Debtors, the Ad Hoc Group of Taj Noteholders, the Official Committee of Unsecured Creditors, and the Ad Hoc Group of B-4 Lenders and (II) Granting Related Relief [Docket No. 5922]

Responses Received: None

Related Documents: None

Status: This matter is going forward.

3. “Asia JV Sale Hearing” Order (I) Establishing Bidding Procedures for the Sale of Certain Assets, (II) Scheduling an Auction and Hearing to Consider the Sale, (III) Approving the Form and Manner of Notice, and (IV) Granting Related Relief [Docket No. 4671]

Responses Received:

- A. Oracle's Rights Reservation Regarding the Taj Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures for the Sale of Certain Assets, (II) Scheduling an Auction and Hearing to Consider the Sale, (III) Approving the Form and Manner of Notice, (IV) Clarifying the Applicability of a Right of First Refusal and a Drag Right and (V) Granting Related Relief [Docket No. 5432]
- B. Objection of Tor Asia Credit Master Fund, L.P. to the Asia JV Sale [Docket No. 5444]

Related Documents:

- A. Revised Dates and Deadlines in Connection With the Asia JV Sale [Docket No. 5047]
- B. Notice of Successful Bidder with Respect to the Asia JV [Docket No. 5433]

Status: This matter is going forward.

4. “Motion to Expedite Hearing on Poland Sale Motion” Motion for Expedited Hearing on Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Take Any Corporate Action Necessary to Consummate the Poland Sale, (II) Authorizing Certain Debtors to Transfer Intercompany Loans, (III) Authorizing the Debtors to Provide Transition Services, and (IV) Granting Related Relief [Docket No. 5702]

Responses Received: None

Related Documents: None

Status: This matter is resolved as moot.

5. “Poland Sale Motion” Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to Take Any Corporate Action Necessary to Consummate the Poland Sale, (II) Authorizing Certain Debtors to Transfer Intercompany Loans, (III) Authorizing the Debtors to Provide Transition Services, and (IV) Granting Related Relief [Docket No. 5701]

Responses Received: None

Related Documents: None

Status: This matter is going forward.

## **II. TOYS DELAWARE CONTESTED MATTERS [CASE NO. 17-34665]**

6. “Joint Chapter 11 Plan Confirmation” Second Amended Joint Chapter 11 Plan of the Taj Debtors and the TRU Inc. Debtors [Docket No. 4547]

Responses Received:

- A. Objection of the United States Trustee to Second Amended Chapter 11 Plans of Taj Debtors and the TRU Inc. Debtors [Docket No. 4935]
- B. Ad Hoc Group of B-4 Lenders’ Limited Objection [Docket No. 5445]
- C. Objection of the Official Committee of Unsecured Creditors [Docket No. 5740]

Related Documents:

- A. Notice of Adjournment of Taj Confirmation Hearing [Docket No. 5585]
- B. Declaration of James Daloia of Prime Clerk LLC Regarding Solicitation of Votes and Tabulation of Ballots Cast on the Second Amended Joint Chapter 11 Plan of the Taj Debtors and the TRU Inc. Debtors [Docket No. 5776]
- C. Debtors' Memorandum of Law in Support of Confirmation of the Third Amended Joint Chapter 11 Plan of the Taj Debtors and Tru Inc. Debtors [Docket No. 5926]
- D. Declaration of Cari Turner in Support of Confirmation of the Third Amended Joint Chapter 11 Plan of the Taj Debtors and Tru Inc. Debtors [Docket No. 5927]

- E. Declaration of Jeffrey S. Stein, Independent Director of Tru Taj LLC and Tru Taj Finance, Inc., in Declaration of Cari Turner in Support of Confirmation of the Third Amended Joint Chapter 11 Plan of the Taj Debtors and Tru Inc. Debtors [docket No. 5928]
- F. Declaration of Christian Tempke in Support of Confirmation of the Third Amended Joint Chapter 11 Plan of the Taj Debtors and Tru Inc. Debtors [Docket No. 5929]
- G. Declaration of Mohsin Y. Meghji, Disinterested Director of Tru Inc., in Support of Confirmation of the Third Amended Joint Chapter 11 Plan of the Taj Debtors and the Tru Inc. Debtors [Docket No. 5930]

Status: This matter is going forward.

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Richmond, Virginia  
Dated: December 11, 2018

*/s/ Peter J. Barrett*

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